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April 9, 2020

Via ECF

Honorable Valerie E. Caproni
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Disabled In Action, et al. v. The City of New York, et al.*, No. 16-cv-8354 (VEC)

Dear Judge Caproni:

The parties write jointly pursuant to the Court's Order of February 4, 2020, granting Plaintiffs' Motion for Partial Summary Judgment and directing the parties to meet and confer in good faith and submit a joint letter describing our efforts to reach a solution on remedy and proposing next steps.

The parties spoke over the phone on February 27 to begin the process directed by the Court. On February 27, Plaintiffs provided a proposal of settlement terms, and Defendants provided a counter-proposal on March 6. The parties have exchanged emails thereafter to discuss the proposals. The parties have not been able to reach agreement regarding the process, timeframe, and framework for remediation. Therefore, we jointly request a referral to the magistrate judge for a settlement conference to bridge the gaps between the parties' proposals. We are hopeful that with the assistance of a neutral third party, we will be able to proceed expeditiously toward settlement.

Respectfully,

A handwritten signature in black ink, appearing to read 'Rebecca Rodgers', is written over a light blue horizontal line.

Rebecca Rodgers
Senior Staff Attorney
Disability Rights Advocates

/s/ Carolyn Kruk

Carolyn Kruk
Senior Counsel
New York City Law Department